

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**NEHEMIAS MEJIA,**

**Plaintiff,**

**vs.**

**NBCUNIVERSAL MEDIA, LLC, et al.,**

**Defendants.**

**Civil No.: 8:19-cv-01563-GJH**

**DEFENDANTS' JOINT STATEMENT REGARDING REMOVAL**

Pursuant to the Court's Standing Order Concerning Removal (Dkt. 5), Defendants jointly state as follows:

1. All of the Defendants were served with a copy of the summons and complaint in this action on April 30, 2019.<sup>1</sup>
2. None of the Defendants are citizens of Maryland. The citizenship of each of the Defendants is set forth in paragraphs 7-23 below.
3. Removal took place within thirty days of service on all Defendants.
4. Removal took place within one year of commencement of this action.
5. All of the Defendants who were named and served in the state court action joined in removal to federal court.
6. By filing this Statement, Defendants do not waive any available defenses, rights, or objections.

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<sup>1</sup> Plaintiff delivered the Complaint, Summons, and Civil Case Information Report to the office of the Registered Agent for NBCUniversal Enterprise, Inc. While this is not sufficient service for many of the Defendants, the Defendants are accepting service as of that date.

7. **NBCUniversal Enterprise, Inc.** is a citizen of Delaware as it is a Delaware corporation with its principal place of business in Delaware.

8. **NBCUniversal, LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. NBCUniversal, LLC is a limited liability company organized under the laws of state of Delaware with its principal place of business in Pennsylvania. The citizenship of its members is as follows:

- a. The members of NBCUniversal, LLC are: Comcast DW Holding, Inc., a Delaware corporation with its principal place of business in Pennsylvania; NBCUniversal Enterprise, Inc., a Delaware corporation with its principal place of business in Delaware; SNL Entertainment Holdings, Inc., a Delaware corporation with its principal place of business in Pennsylvania; Comcast CCW Holdings, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania; Comcast Navy Acquisition, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania; Comcast Snap Holdings II, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania; and Comcast Navy Contribution, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania.
- b. The members of Comcast CCW Holdings, LLC are Comcast Navy Acquisition, LLC, and Comcast Snap Holdings, Inc., a Delaware corporation with its principal place of business in Pennsylvania.

- c. The sole member of Comcast Navy Acquisition, LLC is Comcast Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania.
- d. The members of Comcast Snap Holdings II, LLC are Comcast Navy Acquisition, LLC (above), and Comcast Snap Holdings, Inc., a Delaware corporation with its principal place of business in Pennsylvania.
- e. The members of Comcast Navy Contribution, LLC are: (i) E! Holdings, Inc., a Delaware corporation with its principal place of business in Pennsylvania; (ii) Versus Holdings, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania; (iii) Comcast Contribution Holdings, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania; (iv) Comcast CHC, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania; (v) Comcast SportsNet Philadelphia Holdings, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania; and (vi) Comcast SportsNet New England Holdings, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania.
- f. The members of Versus Holdings, LLC are: (i) Comcast Holdings Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania; and (ii) E! Holdings, Inc., a Delaware corporation with its principal place of business in Pennsylvania.

- g. The sole member of Comcast Contribution Holdings, LLC is Comcast Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania.
  - h. The sole member of Comcast CHC, LLC is Comcast Holdings Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania.
  - i. The members of Comcast SportsNet Philadelphia Holdings, LLC are: (i) Comcast Holdings Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania; and (ii) Comcast Spectator Holding Company, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania.
  - j. The sole member of Comcast Spectator Holding Company, LLC is Comcast Holdings Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania.
  - k. The members of Comcast SportsNet New England Holdings, LLC are: (i) Comcast SportsNet NE Holdings, Inc., a Delaware corporation with its principal place of business in Pennsylvania; and (ii) CSNNE Partner, LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Pennsylvania.
  - l. The sole member of CSNNE Partner, LLC is Comcast Holdings Corporation, a Pennsylvania corporation with its principal place of business in Pennsylvania.
9. **NBCUniversal Media, LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in New York, and its sole member is NBCUniversal, LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

10. **NBCUniversal Shared Services, LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in New York, and its sole member is NBCUniversal Media, LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

11. **NBCUniversal Digital Entertainment LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in New York, and its sole member is NBCUniversal Media, LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

12. **NBCUniversal Digital Enterprises LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in New York, and its sole member is NBCUniversal Media, LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

13. **NBCUniversal Digital Enterprises Productions LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in New York, and its sole member is NBCUniversal Digital Enterprises LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

14. **NBCUniversal Production Services LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company

organized under the laws of the state of Delaware with its principal place of business in New York.

The citizenship of its members is as follows:

- a. Its sole member is Universal Television LLC, a limited liability company organized under the laws of the state of New York with its principal place of business in California.
- b. The sole member of Universal Television LLC is NBCUniversal Media, LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

15. **Telemundo Media LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida. The citizenship of its members is as follows:

- a. Its members are: (i) NBCUniversal Media, LLC, which, as described above, is a citizen of Delaware and Pennsylvania; and (ii) NBC Subsidiary (WTVJ-TV) LLC, a limited liability company organized under the law of the state of Delaware with its principal place of business in Florida.
- b. The sole member of NBC Subsidiary (WTVJ-TV) LLC is NBC Stations Management II LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in New York.
- c. The sole member of NBC Stations Management II LLC is NBC Stations Management LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in New York.
- d. The sole member of NBC Stations Management LLC is NBCUniversal Media, LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

16. **Telemundo Group LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida, and its sole member is Telemundo Media LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

17. **Telemundo Mid-Atlantic LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida, and its sole member is Telemundo Group LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

18. **Telemundo Network Group LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida, and its sole member is Telemundo Media LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

19. **Telemundo Television Studios, LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida, and its sole member is Telemundo Network Group LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

20. **NBCUniversal Networks International Spanish Latin America LLC** is a citizen of Delaware, Pennsylvania, and Florida, because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida. The citizenship of its members is as follows:

- a. Its members are: (i) NBCUniversal Global Networks Latin America LLC, a limited liability company organized under the laws of Delaware with its principal place of

business in Florida; and (ii) Ole Universal Channels LLC, a limited liability company organized under the laws of Delaware with its principal place of business in Florida.

- b. The sole member of NBCUniversal Global Networks Latin America LLC is Universal Studios Company LLC, a limited liability company organized under the laws of Delaware with its principal place of business in California.
- c. The sole member of Universal Studios Company LLC is NBCU Acquisition Sub LLC, a limited liability company organized under the laws of Delaware with its principal place of business in New York.
- d. The sole member of NBCU Acquisition Sub LLC is NBCUniversal Media, LLC, which, as described above, is a citizen of Delaware and Pennsylvania.
- e. The members of Ole Universal Channels LLC are (i) Ole Communications, Inc., a Delaware corporation with its principal place of business in Florida; and (ii) Ole Communications Group (US), LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida.
- f. The sole member of Ole Communications Group (US), LLC is a natural person with U.S. citizenship and a domicile in Florida.

21. **NBCUniversal Networks International Latin America LLC** is a citizen of Delaware, Pennsylvania, and Florida, because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in Florida, and its sole member is NBCUniversal Networks International Spanish Latin America LLC, which, as described above, is a citizen of Delaware, Pennsylvania, and Florida.



22. **NBCUniversal International Networks US LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under the laws of the state of Delaware with its principal place of business in California.

The citizenship of its members is as follows:

- a. Its sole member is Universal City Studios Productions LLLP, a limited liability limited partnership organized under the laws of Delaware with its principal place of business in California.
- b. The partners of Universal City Studios Productions LLLP are: (i) VUE Holding LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in California; and (ii) VUE NewCo LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in California.
- c. The sole member of VUE Holding LLC is VUE NewCo LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in California.
- d. The members of VUE NewCo LLC are: (i) USI Entertainment LLC, a limited liability company organized under the laws of the state of Delaware with its principal place of business in California; and (ii) Universal Studios Company LLC, which, as described above, is a citizen of Delaware and Pennsylvania.
- e. The sole member of USI Entertainment LLC is Universal Studios Company LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

23. **NBCUniversal Digital Lab LLC** is a citizen of Delaware and Pennsylvania because its members are citizens of those states. It is a limited liability company organized under

the laws of the state of Delaware with its principal place of business in California. The citizenship of its members is as follows:

- a. Its sole member is NBCU Television Holding LLC, a limited liability company organized under the laws of Delaware with its principal place of business in California.
- b. The sole member of NBCU Television Holding LLC is Universal TV NewCo LLC, a limited liability company organized under the laws of Delaware with its principal place of business in California.
- c. The members of Universal TV NewCo LLC are: (i) Universal City Studios Productions LLLP, which, as described above, is a citizen of Delaware and Pennsylvania; (ii) USANI Holding Company LLC, a limited liability company organized under the laws of Delaware with its principal place of business in California; and (iii) New-U Studios LLC, a limited liability company organized under the laws of Delaware with its principal place of business in California.
- d. The sole member of both USANI Holding Company LLC and New-U Studios LLC is Vue NewCo LLC, which, as described above, is a citizen of Delaware and Pennsylvania.

Dated: June 11, 2019

Respectfully submitted,  
BALLARD SPAHR LLP

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*Counsel for Defendants*

### **CERTIFICATE OF SERVICE**

I certify that on June 11, 2019, I caused a true and correct copy of the foregoing **Defendants' Joint Statement of Removal** to be served by email, by agreement upon counsel, upon the following:

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June 11, 2019

/s/ Chad R. Bowman  
Chad R. Bowman